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17 Attorneys for Plaintiff
18 UNITED STATES OF AMERICA

19 UNITED STATES DISTRICT COURT

20 FOR THE CENTRAL DISTRICT OF CALIFORNIA

21 UNITED STATES OF AMERICA,

22 Plaintiff,

23 v.

24 CERTAIN RIGHTS TO AND INTERESTS
25 IN THE VICEROY HOTEL GROUP,

26 Defendant.

No. CV 17-4438 DSF (PLAx)

STIPULATION AND REQUEST TO EXTEND
TIME TO RESPOND TO INITIAL
COMPLAINT

Current Response Date:
Claim-11/10/17; Answer-12/04/17

New Response Date:
Claim-12/11/17; Answer-1/4/18

1 On June 15, 2017, the government filed this action against
2 defendant "All Right to and Interest in Viceroy Hotel Group, Held or
3 Acquired, Directly or Indirectly, by JW Hospitality (VHG US) LLC
4 (formerly known as Wynton Hospitality (VHG US) LLC) and JW
5 Hospitality (VHG Intl) Ltd. (formerly known as Wynton Hospitality
6 (VHG Intl) Ltd.)" (the "Defendant Asset"). Mubadala Development
7 Company PJSC ("potential claimant") may have a potential interest in
8 the Defendant Asset.

9 The parties have agreed to an additional extension of the
10 deadlines set forth in Supplemental Rule G(5)(a)(ii) of the
11 Supplemental Rules for Admiralty of Maritime Claims and Asset
12 Forfeiture Actions. Accordingly, potential claimant's time to file a
13 claim to the Defendant Asset is extended from November 10, 2017, to
14 December 11, 2017, and an answer or other responding document to the
15 complaint is extended from December 4, 2017 to January 4, 2018.

16 The parties agree that the extended deadlines will permit the
17 United States and potential claimant to continue to discuss potential
18 claimant's possible interest in the Defendant Asset.

19 By the signature of their attorneys hereunder, the parties
20 stipulate and request that this Court extend the Claim deadline

21 / / /

22 / / /

1 currently set for November 10, 2017, to December 11, 2017, and extend
2 the Answer deadline currently set for December 4, 2017, to January 4,
3 2018.

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5
6 Dated: November 9, 2017

Respectfully submitted,

7 DEBORAH CONNOR
8 Acting Chief, MLARS

9 SANDRA R. BROWN
10 Acting United States Attorney

11 /s/Woo S. Lee

12 JOHN J. KUCERA
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16 JONATHAN BAUM
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Trial Attorneys, MLARS

18 Attorneys for Plaintiff
19 UNITED STATES OF AMERICA
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1 Dated: November 9, 2017

/s/(per e-mail confirmation)

2 WILLIAM BURCK

3 STEPHEN HAUSS

4 Quinn Emanuel Urquhart & Sullivan,
5 LLP

6 Attorney for Potential Claimant

7 MUBADALA DEVELOPMENT COMPANY PJSC